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Idaho Operations Office

# Idaho National Laboratory Strategy and Site-Specific Plan for the Management of Unneeded Materials and Chemicals

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**Prepared for the**
**U.S. Department of Energy**
**DOE Idaho Operations Office**

The information in the *Idaho National Laboratory Strategy and Site-Specific Plan for the Management of Unneeded Materials and Chemicals* (UMCs) was obtained with the cooperation of the professional staff at the Idaho National Laboratory. For additional information, please contact:

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## DEFINITIONS

Legacy Materials-excess or unneeded materials not generated from current operations, or generated by Programs that are no longer in existence, or materials that accumulated because a disposition path was not identified, available, or affordable.

Unneeded Materials and Chemicals- materials and chemicals deemed unneeded upon project completion, or do not have a designated future use without mission-related justification by the cognizant Department of Energy or National Security Administration Program or Site Manager.

# 1. INTRODUCTION

This *Idaho National Laboratory Strategy and Site Specific Plan for the Management of Unneeded Materials and Chemicals (UMCs,)* is in response to a December 22, 2005 Department of Energy (DOE) Memorandum regarding the development of an overall DOE strategy for the management of UMCs. This Plan from the Idaho National Laboratory (INL) satisfies the DOE request and includes information requested in the memorandum and associated attachment and appendix.

The Department of Energy (DOE) Idaho Site has developed this plan for the management and disposition of unneeded materials and chemicals (UMC) in response to the Undersecretary for Energy, Science and Environment and the Administrator for the National Nuclear Security Administration memorandum of December 22, 2005, Strategy for the Management of Unneeded Materials (UMC). DOE Idaho is implementing the strategy described in this plan through the three primary contractors at the INL – Battelle Energy Alliance, LLC (BEA); CH2M-WG Idaho, LLC (CWI); and Bechtel BWXT Idaho, LLC (BBWI). The overarching DOE Idaho strategy is summarized in this section.

- DOE Idaho has consistently ensured compliance with DOE property management regulations under 41 Code of Federal Regulations (CFR) parts 101 and 109 for Federal Direct Operations and Contractors. Each of the three DOE Idaho contracts have property clauses specifying compliance requirements for applicable property management regulations.

- Chemical management systems are in place to routinely inventory, track and manage chemicals. Unneeded chemicals and materials are identified to Waste Generator Services (WGS) or to the Excess Property Disposal Program, as applicable, when end users declare them excess to their needs.

- DOE Idaho estimated inventory of UMC will be provided by each contractor and consolidated into one report for the INL after the end of each fiscal year. Any such inventory would be collected from the authoritative asset tracking databases of the property management system and the chemical management system in addition to the material exchange and lead databases. Summaries of specifically identified UMCs will be available at the end of fiscal year 2007 in support of the annual reporting cycle requirement.

- DOE Idaho currently plans to complete disposition of identified UMCs on schedule by the end of fiscal year 2011.

- An annual assessment and evaluation process for UMCs at the DOE Idaho site will be implemented by December 2006. A summary report of assessment activities completed during the year will be provided during the first quarter of the next fiscal year.

- An annual call for identifying UMCs will occur during the first quarter of each of the fiscal years throughout this plan. Results of the call for UMCs will be reflected in the annual report.

- Existing DOE Idaho site processes for disposition services includes the use of the Office of Procurement and Assistance Management Energy Asset Disposal System (EADS) when applicable; the General Services Administration Federal Disposal System (FEDS); and the Department of Energy, Office of Science, Materials Exchange.

- Each contractor's property, chemical and waste management programs describe the existing policies, requirements, management systems and procedures that address the analyses, tracking, and disposition of materials and chemicals identified as unneeded to the existing and planned technical and operational needs supporting the DOE missions at the INL.

## 1.1 Historical Information

Idaho National Laboratory has completed Operation Clean Sweep Phase 1 (OCS I) for the disposition of items from administrative and office areas that are no longer needed. A campaign to reduce chemical inventories in Science and Technology Complex (STC) laboratories was conducted in 2005, resulting in a basis for estimating inventories and funding requirements for managing future unneeded chemicals.

Based on OCS I and the chemical inventory reduction campaign at STC, the estimated inventory for future Operation Clean Sweep (OCS) campaigns is 10,000 line items of reusable property, 1,000 cubic yard of scrap, and 5,300 individual containers of industrial or hazardous waste. A separate inventory of UMCs will be developed as part of the OCS campaigns to track, reutilize and disposition identified UMCs.

## 1.2 Recycle/Reuse Historical Successes

The INL's commitment to managing UMC is demonstrated by the following success stories:

Contaminated Lead

Waste Disposition Services initiated an innovative Memorandum-of-Agreement between the INL and Idaho State University (ISU), allowing ISU to use radioactively contaminated lead from the INL as radiation shielding at the ISU Accelerator Center. In 2002 alone, over 200,000 pounds of this lead were fabricated into lead bricks and reused as shielding at the Accelerator Center. These bricks allowed the Accelerator Center to increase the number of experiments performed at their facility. Additionally, the INL and ISU achieved a savings of $500,000 by avoiding the need to process and dispose of the contaminated lead, as well as the need to purchase new lead bricks for the Accelerator Center.

Clean lead

As a result of a collaborative effort between INL employees working in the Test Area North (TAN) Waste Generator Services (WGS), Pollution Prevention, and Eliminate Mixed Low Level Waste (EMLLW) Backlog organizations, an alternate user was found for 5 sheets of clean lead totaling 100,000 lbs. The Nevada Test Site (NTS) used the lead to make shields for neutron detectors used on the Z-machine at Sandia National laboratory.

TAN Deactivation, Decontamination, & Decommissioning (DD&D) and TAN WGS employees recovered 5 sheets of clean lead from Water Reactor Research Test Facility (WRRTF) during DD&D activities. The largest sheet of lead was a 9.5-foot square that weighs 34,500 lbs. It was clad in steel and 18 inches wide at its thickest point. The smallest sheet was 9 foot by 3.5 foot and weighed 14,200 lbs. As it was clean lead, normally it would have been sent to a lead recycler with whom the INL had a contract for recycling. However, the subcontractor's facility was physically unable to process pieces of this size. Unless an alternative user was located, the lead sheets would have been disposed of as waste. Conservatively, this waste minimization project saved the INL $51,000 in waste disposal costs. Additionally, NTS saved at least $50,000 in procurement costs.

Amercium-241/beryllium neutron sources

Five americium-241/beryllium neutron sources were transferred to an alternate user at the INL Power Burst Facility (PBF) instead of being disposed of as mixed waste. These neutron sources had been used as part of the Fluorinel and Storage Test Facility Soluble Poison Monitor System in the fluroinel dissolution process. This system was designed to detect, display, and transmit cadmium concentrations in solution. Each source capsule is an inert gas welded double encapsulation constructed of stainless steel. Each source contains 300 mCi of Am-241 as an americium-beryllium mixture in the form of americium oxide.

The only disposal option for these sources was to certify and send them to the Waste Isolation Pilot Plant (WIPP). However, due to the long half-life of Am-241, the sources were still of potential use. Employees from the ICP's EMLLW transferred the neutron sources to the INL Nonproliferation & Monitoring Systems organization, where they will be used in testing and calibration of pulsed photonuclear neutron detectors (PPNDs). The PPNDs are designed to detect shielded nuclear materials. The INL saved an estimated $25,000 in waste certification and disposal costs. The estimated value for each neutron source is $4,000; therefore, the INL saved an additional $20,000 in procurement costs. Total savings: $45,000.

Contaminated 200-ton waste compactor

A new home has been found for the INL's Waste Experimental Reduction Facility (WERF) waste compactor. The compactor weighed 32,000 pounds, had a compaction force of 200 tons, and was used at WERF for volume reduction of low-level radioactive waste for many years. Changes in low-level waste management practices and the accelerated closure of the PBF area required removal and disposition of the compactor.


Due to internal radioactive contamination, the compactor was planned to be disposed on-site at the Radioactive Waste Management Complex (RWMC) as low-level waste. Instead, on August 11, 2004, the 200-ton compactor was shipped to the Duratek, Inc.- Bear Creek Facility in Oak Ridge, Tennessee. Duratek is a commercial company offering technologies, services and experience, to safely and cost-effectively address tough issues in environmental remediation and radioactive waste disposition. At Bear Creek, the compactor will be used for compaction of radioactive waste received from the Bechtel Jacobs Company Legacy Waste Project for DOE Oak Ridge.

This waste minimization project required innovation and teamwork between employees working in the Waste Disposal Landfills Projects, Waste Generator Services, Radiation Control, Packaging & Transportation, Industrial Safety, the Property Reutilization & Disposal Office, and Duratek. The Waste Disposal Landfills Projects, Waste Generator Services, and Packaging and Transportation are all subprojects under ICP's Eliminate Mixed Low Level Waste Backlog/Services Project. Not only did the INL receive pollution prevention benefits through avoided burial space, but this waste minimization project also saved the INL $8,500 in waste disposal costs. Lastly, the compactor will continue to provide service to the DOE who sponsored the acquisition costs of approximately $280,000 for the compactor in 1986.

Steam tanks

Six steam tanks from the DD&D of the WRRTF were sold to a private company for reuse, generating proceeds for the INL and saving the INL approximately $5,100 in waste disposal costs.

Employees from the TAN DD&D project, TAN WGS, and the Property Disposal Office worked together to dispose of the tanks. Each tank was constructed of 8-inch thick steel, 20 feet long, and 6-to 8-feet in diameter. In order to transport the tanks, each had to be cut into pieces with a torch. This resulted in 33 pieces, with each piece weighing approximately 30,000 pounds.

The pieces were disposed in place at the WRRTF facility by the Property Disposal Office. The material was offered for sale to the general public via the Government Property Sales Process. Not only did the INL receive pollution prevention benefits through avoided burial space at the CFA landfill, but this waste minimization project also saved the INL $5,100 in waste disposal costs and generated proceeds for the INL.

Gas Cylinders

One hundred forty-eight cylinders were recovered from the CPP-84 Gas Cylinder Remediation Site; one hundred twenty-five of these were sold to a private company for reuse, generating proceeds for the INL and saving the INL the cost of waste disposal. Five additional cylinders were sent to off-site vendors for recycling. Only eighteen had to be disposed of at the CFA Asbestos Landfill as there was asbestos integrated into the cylinders themselves.

Employees from WAG 3, the Waste Disposal Services Project, the CFA Landfill, and the Property Disposal Office worked together to dispose of the cylinders. Of the one hundred twenty-five cylinders, or approximately 10,000 pounds, that were processed through the Property Disposal Office and offered for sale to the general public as scrap metal via the Government Property Sales Process, ninety-seven were construction gas cylinders or found empty. The other twenty-eight contained hydrofluoric gas and required treatment and cleaning prior to being offered for sale to the public.

Due to the high purity of their contents, five of the cylinders were sent to off-site vendors for recycling. One of these was full of chlorine gas and four contained Freon.

Recycled Quantities

The following table reflects the Pollution Prevention (P2) Plan's results through FY 2005.

| Quantities Recycled | | | | | |
|---|---|---|---|---|---|
| Material | FY01 | FY02 | FY03 | FY04 | FY05 |
| paper/cardboard | 109.70 mt* | 100.9 mt | 91.68 mt | 97.78 mt | 105.2 mt |
| phone books | 2.10 mt | 4.4 mt | 0.0 mt | 0.43 mt | 0.0 mt |
| Lead | 0.00 mt | 99.0 mt | 9.26 mt | 47.01 mt | 3.86 mt |
| RCRA scrap metal | 81.30 mt | 16.4 mt | 15.96 mt | 4.85 mt | 22.33 mt |
| Silver | 0.00 mt | 0.0 mt | 0.0 mt | 1.09 mt | 0.01 mt |
| antifreeze | see note | see note | 1.99 mt | 4.20 mt | 5.30 mt |
| engine oil | 45.10 mt | 25.4 mt | 26.57 mt | 35.26 mt | 76.83 mt |
| Toner cartridge | 4.60 mt | 4.1 mt | 4.71 mt | 3.52 mt | 3.43 mt |
| batteries | 23.00 mt | 18.1 mt | 17.19 mt | 29.88 mt | 26.37 mt |
| fluorescent bulbs | see note | see note | 69.01 mt | 4.8 mt | 6.68 mt |
| Wood chips | 1748.00 mt | 77.3 mt | 0.0 mt | 1360.78 mt | 217.7 mt |

* mt = Metric Ton

NOTE: Data for fluorescent bulbs and antifreeze was not collected in FY-01 and FY-02.

The following table reflects the number of line items of personal property that were reused during fiscal years 2004 and 2005 through the INL Property Disposal Office.

| Reuse through Property Disposal Office | | |
|---|---|---|
| Material | FY04 | FY05 |
| Excess computers and equipment to schools | 1031 items | 654 items |
| Excess materials to other DOE sites, INL Site orgs, state agencies, etc | 3489 items | 3258 items |
| Excess materials to public | 8163 items | 6293 items |

### 1.3 Plan Development and Layout

This plan was developed by staff in the Logistics & Property Management department with assistance from Environment, Safety, Health and Quality Assurance (ESH&QA) for chemical management. This plan is laid out in three main sections.

- Section 2.1 describes Battelle Energy Alliance's (BEA) existing INL Management Systems, Programs, and tools used to ensure compliance with regulations regarding UMCs;
- Section 2.2 summarizes existing CH2M-WG (CWI) INL Management Systems, Programs, and tools used to ensure compliance with regulations regarding UMCs,
- Section 2.3 discusses Bechtel BWXT Idaho (BBWI) existing INL Management System, Programs, and tools used to ensure compliance with regulations regarding UMCs.

## 2. INL'S PLAN FOR MANAGEMENT OF 'UNNEEDED MATERIALS AND CHEMICALS (UMCS)

### 2.1 Battelle Energy Alliance (BEA)

BEA recognized legacy issues at the INL regarding UMC and has implemented actions through currently existing programs to address this issue. The primary organization responsible for implementing the INL UMC plan is the Logistics & Property Management department with assistance from Environment, Safety, Health and Quality Assurance (ESH&QA) for chemical management and Waste Generator Services.

Materials will be considered as UMCs if unneeded by the user. No new inventories (data bases) will be developed, but will rather rely on existing programs and associated inventories for each of the four material groups of interest:

1. Excess property and scrap metal
   - Property Management maintains inventories of non-radiological government property no longer needed by the current user, and dispositions through transfer, donation, or sale.

2. Chemicals
   - Chemicals no longer needed by user that are not dispositioned as waste will be placed on the material exchange database for up to one year to provide time to find new users. If at one year no users are found, chemicals will be dispositioned as waste.

3. Lead
   - Lead across the site is identified on the lead data base, and any lead listed as recyclable lead will be considered unneeded by the INL

4. Radioactive materials
   - The material exchange database has historically been used only for chemicals, but is being modified to track unneeded radiological materials. These materials will be dispositioned as waste when no new users have been identified.

   - Sealed sources are identified as unneeded by current users and managed in accordance with LWP-15006, which provides for placement on an inventory for potential use elsewhere on the INL or off-site.

Processes are in place that facilitate identification of UMCs, such as property management procedures requiring identification of excess government property, and physical walk-downs of chemical inventories by chemical custodians. In addition, annual data calls will be initiated for users to identify materials and chemicals in excess of current needs. Materials and chemicals identified during the data call will be added to the appropriate inventories and managed under the respective programs.

BEA currently has an approved property management plan that is in compliance with the DOE Property Management Regulations 41 CFR Parts 101 and 109. The subsequent approved Property Management System reflects how the site ensures compliance and the organization responsible for the overall implementation of the regulations and requirements. Compliance to the latest release of DOE Order 580.01 will be completed by July 2007.

BEA is currently using CWI to track inventory and manage chemicals. The CWI waste management program disposes of unneeded chemicals. The CWI excess program manages non-proliferation sensitive property. End users declare materials unneeded at the end of projects or programs, or through inventory reduction campaigns such as Operation Clean Sweep (OCS). Programs for disposition of unneeded materials and chemicals are identified in DOE/ID-10333, Pollution Prevention Plan.

A key component of the P2 Plan that will be used to track UMCs will be the Material Exchange Program (MEP), which is managed by CWI. The MEP is available for use by BEA and BBWI.

BEA is currently using CWI to track lead used or stored on the INL site on the CWI lead database. The CWI waste management program recycles or disposes of unneeded lead. End users declare lead unneeded at the end of projects or programs, or through inventory reduction campaigns such as OCS.

BEA facilities that store radioactive materials are required to keep an inventory and manage these materials. The CWI waste management program disposes of unneeded radioactive materials. End users declare radioactive materials unneeded at the end of projects or programs, or through inventory reduction campaigns such as OCS.

BEA has completed OCS I for the disposition of items from administrative and office areas that are no longer needed. A campaign to reduce chemical inventories in Science and Technology Complex (STC) laboratories was conducted in 2005, resulting in a basis for estimating inventories and funding requirements for managing future unneeded chemicals.

Based on OCS-I and the chemical inventory reduction campaign at STC, the estimated inventory for future OCS campaigns is 10,000 line items of reusable property, 1,000 cubic yards of scrap, and 5,300 individual containers of industrial or hazardous waste. A separate inventory of UMCs will be developed as part of the OCS campaigns to track, reutilize and disposition identified UMCs.

BEA will implement Operation Clean Sweep Phase 2 (OCSII) in FY07 for the disposition of the current inventory of UMCs from technical and operational areas as identified by the organizations' users as items excess to their programs' needs.

BEA has assessed and evaluated potential volumes of unutilized materials and chemicals against program budget and activities for the upcoming budget year as identified by the April 2006 report submitted to DOE under CFO Request: FY 2008-2012 CPR Funding Requirements for Unneeded Materials and Chemicals. Specifically, Attachment Q, FY 2008-2012 CPR Funding Requirements to Manage Unneeded Material and Chemicals, Idaho National Laboratory, Office of Nuclear Material.

Standard project management controls and supporting property, chemical, and waste management programs will assess and evaluate the unutilized materials and chemicals against program budget and activities for the upcoming budget year(s) to identify UMCs. This will include comparing the planned activities against the actual activities for the fiscal year and the upcoming year. Implementation funding in FY-07 for OCSII to directly support the UMC requirements (estimated at $1.5 million) is pending. Funding profiles for each of the next four years (FY-08 – FY-11) is dependent on DOE-ID approval of this plan and subsequent budget year funding approvals to continue the identification, tracking, disposition and reporting of UMCs.

BEA currently plans to complete disposition of identified UMCs on schedule by the end of fiscal year 2011 as reflected by the following schedule:

FY-07 – FY-08

| | |
|---|---|
| 09/01/06 – 10/01/06 | Assign a Project Manager to manage the UMC process |
| 10/01/06 – 11/01/06 | Issue an INL data call for users to identify materials and chemicals in excess of current needs. Coordinate data with Operation Clean Sweep campaign to ensure that focus material group inventories are identified as potential UMCs |
| 10/20/06 | Issue UMC Annual status report to DOE-ID |
| 11/01/06 – 03/30/07 | Plan disposition of materials and chemicals identified in the October 2006 data call. |
| 04/01/07 – 09/30/07 | Conduct Operation Clean Sweep at RTC, including collection and final disposition. Document activities, update databases, document materials held for future use, etc. |

FY-08 – FY-09

| | |
|---|---|
| 10/01/07 – 11/01/07 | Issue an INL data call for users to identify materials and chemicals in excess of current needs. Coordinate data with Operation Clean Sweep campaign to ensure that focus material group inventories are identified as potential UMCs |
| 10/20/07 | Issue UMC Annual status report to DOE-ID |
| 11/01/07 – 03/30/08 | Plan disposition of materials and chemicals identified in the October 2007 data call. |
| 04/01/08 – 09/30/08 | Conduct Operation Clean Sweep at MFC, including collection and final disposition. Document activities, update databases, document materials held for future use, etc. |

FY-09 – FY-10

| | |
|---|---|
| 10/01/08 – 11/01/08 | Issue an INL data call for users to identify materials and chemicals in excess of current needs. Coordinate data with Operation Clean Sweep campaign to ensure that focus material group inventories are identified as potential UMCs |
| 10/20/08 | Issue UMC Annual status report to DOE-ID |
| 11/01/08 – 03/30/09 | Plan disposition of materials and chemicals identified in the October 2008 data call. |
| 04/01/09 – 09/30/09 | Conduct Operation Clean Sweep at STC including collection and final disposition. Document activities, update databases, document materials held for future use, etc. |

FY-10 – FY-11

| | |
|---|---|
| 10/01/09 – 11/01/09 | Issue an INL data call for users to identify materials and chemicals in excess of current needs. Coordinate data with Operation Clean Sweep campaign to ensure that focus material group inventories are identified as potential UMCs |
| 10/20/09 | Issue UMC Annual status report to DOE-ID |
| 11/01/09 – 03/30/10 | Plan disposition of materials and chemicals identified in the October 2009 data call. |
| 04/01/10 – 09/30/10 | Conduct Operation Clean Sweep at Site Wide Areas including collection and final disposition. Document activities, update databases, document materials held for future use, etc. |

The OSCII plan will include developing an inventory of UMCs with the direct input from technical and operational organizations and the existing chemical management tracking system, waste management system, accountable asset management system, and the property disposal tracking system. The technical and operational organizations will identify those materials and chemicals that are unneeded or excess to the needs of their programs. UMC will be dispositioned through processes including reutilization, return to vendor, material exchange programs, excess, surplus sale, and disposal through WGS.

The existing BEA Property Management System's procedure assists to identify opportunities for reutilization, recycle, sales, and disposition of UMCs within the INL, DOE and other federal agencies.

The existing contract agreement for disposition services includes the use of the following U.S. Government systems: Office of Procurement and Assistance Management Energy Asset Disposal System (EADS) when applicable; the General Services Administration Federal Disposal System (FEDS); and the Department of Energy, Office of Science, Materials Exchange. The Logistics & Property Management department will be responsible for using these systems and the continuous communication with laboratory and facility organizations that items are available for reuse.

BEA will provide enhanced interim storage capability for research and development (R&D) and Science and Technology (S&T) equipment that is not currently in use but could be useful for future projects.

BEA will provide interim storage of radioactive materials at the Reactor Technology Complex (RTC) and Materials and Fuels Complex (MFC). Inventories are kept at each of the areas. End users will identify the continued need or usefulness of the radioactive materials they control.

## 2.2 CH2M-WG (CWI)

CWI operates the Idaho Cleanup Project, a DOE project with a completion date of 2012. As such, CWI does not anticipate having UMCs as defined in this document until completion of this contract. CWI recognizes the importance of proper management of UMCs and will manage any UMCs identified in the future through currently existing programs.

The Property Management Program includes the use of the following U.S. Government systems: the Office of Procurement and Assistance Management Energy Asset Disposal System (EADS) when applicable; the General Services Administration Federal Disposal System (FEDS).

Excess property is managed and disposed through the CWI Property Management Program. The program provides property reuse and disposal services. Property reuse includes INL reuse, transfers to other government agencies or acquisition of excess assets from other government agencies. Disposal includes transferring, donating or selling excess and surplus property such as:

- Vehicles — passenger motor vehicles, light trucks, trailers, motor scooters, truck tractors, and heavy equipment
- Scrap — stainless steel, copper, carbon, brass, bronze, and galvanized metal
- Buildings — manufactured homes and complete buildings
- Computer Equipment — CPUs, monitors, disk drives, modems, printers, and plotters
- Miscellaneous Categories of Property — industrial machinery, mills, lathes, drill presses, shears, meters, and electrical test equipment.

The Chemical Services Program manages and tracks chemicals to support life cycle management of chemicals from procurement initiation and chemical approval through acquisition, compliant and safe storage, inventory management and reporting and finally working with Waste Generator Services for disposal of unwanted chemicals.

The Material Exchange Program (MEP) part of the INL-site P2 strategy and is managed by CWI. The MEP is available for use by BEA and BBWI. The MEP facilitates the reutilization of unwanted materials and chemicals. Custody of these materials is transferred to programs and employees that can use them. Materials exchanged under the MEP include chemicals, containerized gases, paints, oils, greases, degreasers, solvents, adhesives, grouts, sealants, radioactive or radioactively contaminated materials, and pesticides. The MEP excludes the following items: materials regulated by other programs such as recycling or the precious metals program; materials that have been designated as wastes; and items defined by Property Management as excess materials.

Waste Generator Services (WGS) provides safe, effective, and compliant waste management services for CWI. The prime objective of WGS is to ensure waste characterization and management related activities are performed in compliance with all applicable laws and regulations governing these activities. WGS provides full-service, turnkey, professional waste management services for waste within their project scope. Other objectives include providing a streamlined approach to waste determination, proactively working with generators to minimize the generation of waste, achieving single-point accountability for management of each waste stream, and improving cost-effectiveness.

CWI has subcontracts in place to recycle many municipal and hazardous wastes. Most of these contracts are managed by WGS personnel. The office recycling contract is managed by the Pollution Prevention (P2) Program and includes office paper, computer paper, and corrugated cardboard generated from non-radiological controlled areas. Lead, batteries (Ni-Cad, mercury, silver), silver, electronic circuit boards, cadmium, and other materials that are not radiologically contaminated, no longer used by CWI, and that meet the criteria of the DOE moratorium are shipped off-Site for recycling by companies that meet environmental and financial audits. WGS personnel and the P2 Coordinator continue to evaluate recycling options for other used products or waste materials that have recycling potential.

## 2.3 Bechtel BWXT Idaho (BBWI)

BBWI currently has an approved property management plan that is in compliance with the DOE Property Management Regulations 41 CFR Parts 101, 102 and 109. The subsequent approved Property Management System reflects how the site ensures compliance and the organization responsible for the overall implementation of the regulations and requirements.

The BBWI Environmental Department tracks EPCRA chemical inventory and the Material Management operation has implemented a program for disposing of non-proliferation sensitive property. Programs for identifying, tracking, and disposition of unneeded materials and chemicals are identified in DOE/ID-10333, Pollution Prevention Plan.

BBWI will implement a project clean up operation in FY-07 to address UMCs from technical and operational areas. A day will be set aside each year to identify and coordinate management of UMCs project wide.

BBWI has assessed and evaluated unutilized materials and chemicals against program budget and activities for the upcoming budget year and will be submitting a funding requirement to DOE.

Standard program management controls and supporting property management procedures will annually assess and evaluate the unutilized materials and chemicals against program budget and activities for the upcoming budget year to identify UMCs.

The existing BBWI Property Management System's procedure assists to identify opportunities for reutilization, recycle, sales, and disposition of UMCs within DOE and other federal agencies.

The existing contract agreement for disposition services includes the use of the following U.S. Government systems: the Office of Procurement and Assistance Management Energy Asset Disposal System (EADS) when applicable; the General Services Administration Federal Disposal System (FEDS); and the Department of Energy, Office of Science, Materials Exchange.

## 3.0 Annual Assessment and Evaluations of UMCs

### 3.1 Annual Assessments and Data Calls

At a minimum, annual assessments will be completed and reported with the annual inventory reports. Self-assessments are routinely performed across the Laboratory. An annual assessment of the data quality and accuracy of the UMC data call is conducted as a part of the OCS program. The assessments seek to verify that chemical, lead, radioactive materials and excess property data is accurate and complete. Assessment results may point to problems in the UMC program, which are followed up with recommendations and corrective actions.

During the annual UMC data calls, INL organizations review their previously reported legacy challenges and UMCs and update the status to report any progress made, or changes in condition that may impact risk. In addition, INL organizations are encouraged to report additional challenges identified over the past year. The OCS project coordinates annual risk assessments of reported challenges with senior management and subject matter experts to identify vulnerabilities, prioritize challenges and establish the basis to allocate funding for the next fiscal year or request additional funding for challenges that present a significant environmental vulnerability.

The annual data call will include a request for the identification of all UMCs above and beyond those reported previously as challenges in addition to the confirmation and status update of challenges previously reported and identified by the INL contractors. The schedule for self assessments related to the implementation of the plan will be dependent on the funding approvals.

The annual assessment report will include review of data call activities and summarize the annual Property Management reports required by DOE for scrap metal and excess property and the databases managing the radioactive materials, chemicals and lead materials.

## 4.0 Reporting

4.1 Submittal of INL Report by BEA.

The annual summary UMC and assessment reports will be provided by CWI and BBWI to BEA as the reporting lead. BEA will coordinate the collection of data annually from CWI and BBWI and submit the consolidated report for the INL.

Reporting information for the excess of unneeded property will be provided in accordance with BEA's and CWI's DOE-approved Property Management Systems as required by 41 CFR.

- Excess Personal Property Furnished to non-Federal Recipients Report, October 31: An annual report of personal property transferred under the Used Energy-Related Laboratory Equipment Grant Program, the Education and Research Transfer Program (ERTP), and for Economic Development.

- Negotiated Sales Report, October 31: An annual report describing any negotiated disposals of surplus personal property having an estimated fair market value of more than $5,000.

- DOE Online Sales E-Bay, BID 4 Assets Report, October 31: An annual report of net sales data for property sold on line.

- Exchange-Sale Report, December 1: An annual report of any property exchanged or sold including the pertinent FSC group, number of items, OAC, exchange allowance or sales proceeds and source from which the property was originally acquired.

- Annual Real Property Disposal Report to GSA, December 31: An annual report of disposals of real property in the previous fiscal year, forecast of real property to be excessed and real property donations.

Reporting information for the unneeded chemicals, lead and radiological materials will be provided annually in a collective summary report by October 20.